

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

**IN RE: AME CHURCH EMPLOYEE  
RETIREMENT FUND LITIGATION**

**MDL DOCKET NO.  
1:22-md-03035-STA-jay**

**ALL CASES**

---

**NEWPORT GROUP, INC.'S MOTION TO COMPEL  
DEPOSITIONS OF THREE AMEC WITNESSES**

---

Defendant Newport Group, Inc. (“Newport”), by and through undersigned counsel, hereby moves under Federal Rule of Civil Procedure 37 and Local Rule 26.1 for an order compelling Defendants African Methodist Episcopal Church (“AMEC”), AMEC Ministerial Retirement Annuity Plan, AMEC Department of Retirement Services, AMEC General Board, and AMEC Council of Bishops (collectively, the “AMEC Defendants”) to produce the following individuals for depositions on dates mutually agreed upon by the respective parties prior to the close of fact discovery: (i) Bishop John Franklin White; (ii) Bishop Philip Robert Cousin Sr.; (iii) and Bishop Gregory G. M. Ingram. As discussed in further detail in the accompanying Memorandum of Law, each of these individuals has information relevant to Plaintiffs’ claims and the AMEC Defendants’ cross-claims asserted against Newport, and the AMEC Defendants have not proffered any valid reasons for refusing to produce these three individuals.

WHEREFORE, Newport respectfully requests that the Court GRANT this Motion and COMPEL the depositions of Bishops White, Cousin, and Ingram on dates mutually agreed upon by the respective parties prior to the close of fact discovery.

DATED: June 24, 2024

Respectfully submitted,

/s/ Lars C. Golumbic  
Lars C. Golumbic  
Sean C. Abouchedid  
Mark C. Nielsen  
Shaun A. Gates  
Larry M. Blocho Jr.  
GROOM LAW GROUP, CHARTERED  
1701 Pennsylvania Avenue, NW  
Washington, D.C. 20006  
Phone: (202) 857-0620  
Email: lgolumbic@groom.com  
sabouchedid@groom.com  
mnielsen@groom.com  
sgates@groom.com  
lblocho@groom.com

*Counsel for Defendant/Cross-Defendant  
Newport Group, Inc.*

**CERTIFICATE OF CONSULTATION**

I certify that the undersigned counsel for Newport consulted with Mary Wu Tullis, counsel for the AMEC Defendants, by phone on May 21, 2024, and by email on May 29, June 4, June 10, and June 14, 2024 regarding the requested depositions at issue in this motion. Ms. Tullis advised that the AMEC Defendants are unwilling to make the witnesses available for the requested depositions.

/s/ Sean C. Abouchedid  
Sean C. Abouchedid

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2024, a true and correct copy of the foregoing document was sent to all counsel of record via the CM/ECF system.

/s/ Lars C. Golumbic  
Lars C. Golumbic